



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM:ADR/AS
F. #2024R00396

271 Cadman Plaza East
Brooklyn, New York 11201

November 26, 2025

By Email and ECF

Mia Eisner-Grynsberg, Esq.
Samuel Jacobson, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Halima Salman
Criminal Docket No. 24-206 (NCM)

Dear Counsel:

The government writes pursuant to the Court's October 27, 2025 Order directing it to provide certain particulars in connection with the above case. *See* ECF No. 121 at 16 (the "Order"). Specifically, the Court ordered the government "to provide particulars regarding the dates and locations it alleges that defendant received military-type training, if and when that information becomes available to the government." *Id.* The Court further instructed that, "[i]f the government does not currently have this information, it is ordered to provide a bill of particulars identifying the dates and locations where it is aware that military training associated with the Nusaybah Katiba occurred in Syria during the relevant time period, whether or not the government alleges that defendant was present at those trainings. If the government determines that it does not have this precise information, it 'may so indicate in its bill of particulars and provide as much detail as it can.'" *Id.* (citation omitted). Further to the Court's Order, the government provides the below information.

First, the government alleges that the defendant received military-type training from and on behalf of the Islamic State of Iraq and al-Sham ("ISIS") in Syria in or about and between July 23, 2017 and March 17, 2018. The government does not have additional information about the precise timing and location of the defendant's military-type training, and those details are not necessary in order to sustain the government's burden of proof at trial. The government again refers the defendant to the extensive additional information contained in the Complaint, *see* ECF No. 1, and the voluminous discovery in the case.

Second, based upon the information now known to the government, the government believes the evidence at trial will establish that, during the relevant timeframe noted above,

military-type training associated with the Nusaybah Katiba occurred in Syria in locations including Raqqah, Mayadin, al-Barakah Province and al-Furat Province.¹

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: _____ /s/
Andrew D. Reich
Amanda Shami
Assistant U.S. Attorneys
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cc: Clerk of Court (NCM)

¹ As the government has previously indicated, it does not allege that the defendant received military-type training in Raqqah.